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CLERK US DISTRICT COURT  
DISTRICT OF ARIZONA

CR21-02521 TUC-JAS(DTF)

13 IN THE UNITED STATES DISTRICT COURT  
14 FOR THE DISTRICT OF ARIZONA

15 United States of America,  
16  
17 Plaintiff,

18 vs.

19 Sean Lee Arnold,  
20  
21 Defendant.

INDICTMENT

Violations:

21 U.S.C. § 846  
(Conspiracy to Possess with Intent to  
Distribute Methamphetamine)  
Count 1

21 U.S.C. §§ 841(a)(1) and  
841(b)(1)(A)(viii)  
(Possession with Intent to Distribute  
Methamphetamine)  
Count 2

18 U.S.C. § 922(g)(1)  
18 U.S.C. § 924(a)(2)  
(Possession of a Firearm and  
Ammunition by a Convicted Felon)  
Count 3

18 U.S.C. § 924(d); 21 U.S.C. § 853;  
28 U.S.C. § 2461(c)  
(Forfeiture)

22 THE GRAND JURY CHARGES:

23 COUNT 1

24 Beginning at a time unknown, to on or about August 31, 2021, in the District of  
25 Arizona, SEAN LEE ARNOLD, did knowingly and intentionally combine, conspire,  
26 confederate and agree with persons known and unknown to the grand jury, to possess with  
27  
28

1 intent to distribute 50 grams or more of methamphetamine, or 500 grams or more of a  
2 mixture or substance containing a detectable amount of methamphetamine, a Schedule II  
3 controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and  
4 841(b)(1)(A)(viii).

5 All in violation of Title 21, United States Code, Section 846

6 **COUNT 2**

7 On or about August 31, 2021, in the District of Arizona, SEAN LEE ARNOLD did  
8 knowingly and intentionally possess with intent to distribute 50 grams or more of  
9 methamphetamine, or 500 grams or more of a mixture or substance containing a detectable  
10 amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21,  
11 United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).

12 **COUNT 3**

13 On or about August 31, 2021, in the District of Arizona, SEAN LEE ARNOLD,  
14 knowing that he had been convicted of a crime punishable by imprisonment for a term  
15 exceeding one year, did knowingly possess firearms and ammunition, that is: one Marlin  
16 Firearms Company, J.C. Higgins, model 100, .22 caliber rifle; and one round of .38  
17 ammunition with markings "P M C" and "38 SPL;" said firearm and ammunition not  
18 having been manufactured in Arizona and thus affecting interstate or foreign commerce in  
19 that they previously were transported into the state of Arizona from another state or foreign  
20 country; in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

21 **FORFEITURE ALLEGATION**

22 Upon conviction of one or more of the offenses alleged in Counts 1 through 3 of  
23 this Indictment, defendant, SEAN LEE ARNOLD, shall forfeit to the United States  
24 pursuant to:

25 a) Title 21, United States Code, Section 853, all right, title, and interest in (1)  
26 any property, real or personal constituting, or derived from, any proceeds the defendant  
27 obtained, directly or indirectly, as the result of the said violations, and (2) any property  
28

1 used, or intended to be used, in any manner or part, to commit, or to facilitate, the  
2 commission of the said violations.

3 b) Title 18, United States Code, Section 924(d), and Title 28, United States  
4 Code, Section 2461(c), any firearms and ammunition involved in the commission of the  
5 offense.

6 The property to be forfeited includes, but is not limited to: one Marlin Firearms  
7 Company, J.C. Higgins, model 100, .22 caliber rifle; one round of .38 ammunition with  
8 markings "P M C" and "38 SPL; and \$3800 in U.S. currency.

9 If any of the forfeitable property, as a result of any act or omission of the defendant:  
10 (1) cannot be located upon the exercise of due diligence; (2) has been transferred or sold  
11 to, or deposited with, a third party; (3) has been placed beyond the jurisdiction of the court;  
12 (4) has been substantially diminished in value; or (5) has been commingled with other  
13 property which cannot be divided without difficulty; it is the intent of the United States,  
14 pursuant to Title 21, United States Code, Section 853(p) to seek forfeiture of any other  
15 property of said defendant up to the value of the above forfeitable property, including but  
16 not limited to all property, both real and personal, owned by the defendant.

17 All pursuant to Title 18, United States Code, Section 924(d); Title 21, United States  
18 Code, Section 853; Title 28, United States Code, Section 2461(c); and Rule 32.2.(a),  
19 Federal Rules of Criminal Procedure.

20 A TRUE BILL

21 / S /

22 FOREPERSON OF THE GRAND JURY  
23 Date: September 29, 2021

24 GLENN B. McCORMICK  
25 Acting United States Attorney  
District of Arizona

**REDACTED FOR  
PUBLIC DISCLOSURE**

26 / S /  
27 ASHLEY CULVER  
Assistant U.S. Attorney